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*Attorneys for Defendants Nationstar Mortgage  
LLC and HSBC Bank, N.A., as Trustee for the  
Holders of Deutsche Alt-A Securities Mortgage  
Loan Trust, Mortgage Pass-Through Certificates,  
Series 2006-OA1*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Jose Benjamin Rodriguez, an individual,

Plaintiff,

vs.

NATIONSTAR MORTGAGE, LLC; HSBC  
BANK N.A AS TRUSTEE FOR HOLDERS OF  
DEUTSCHE ALT-A SECURITIES  
MORTGAGE LOAN TRUST, MORTGAGE  
PASS-THROUGH CERTIFICATES SERIES  
2006-OA1; CLEAR RECON CORP;  
COUNTRYWIDE BANK, NA; BANK OF  
AMERICA, N.A. AS SUCCESSOR BY  
MERGER TO BAC HOME LOANS  
SERVICING LP FKA COUNTRYWIDE HOME  
LOANS SERVICING LP.

Defendants.

Case No.: 2:16-cv-02180

**DEFENDANTS' MOTION TO EXTEND  
TIME TO RESPOND TO COMPLAINT  
BY 45 DAYS (First Request)**

Defendants Nationstar Mortgage LLC (**Nationstar**) and HSBC Bank, N.A., as Trustee for the Holders of Deutsche Alt-A Securities Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2006-OA1 (**HSBC**) (collectively, **defendants**) move to extend the time to file initial responsive pleadings under Federal Rule of Civil Procedure 6(b) and Local Rule 6-1. Defendants' initial responsive pleading is currently due on September 22, 2016.

**I. Case Background**

This dispute arises out of the servicing, and eventual foreclosure, of a loan secured by a deed of trust encumbering real property located at 4353 Grey Spencer Dr., Las Vegas, NV 89141. Plaintiff alleges a number of federal and state claims against defendants including violations of the Truth in Lending Act, Regulation Z, and NRS 107.

**II. Good Cause Exists To Grant**

Defendants seek an additional 21 days to respond to the complaint. In the course of obtaining and reviewing defendants' records in this case, it came to undersigned counsel's attention that on the same day plaintiff filed this suit, he also filed for bankruptcy. In light of this, defendants have filed a notice of bankruptcy and seek time to determine the impact of this bankruptcy.

This request is not being made for improper purpose and no party will be prejudiced by the requested relief.

**III. CONCLUSION**

Based on the foregoing, the Court should grant the requested extension of 45 days to respond to plaintiff's complaint, from September 22, 2016 to November 7, 2016.

DATED this 21<sup>st</sup> day of September, 2016.

**AKERMAN LLP**

/s/ Rebekkah Bodoff

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IT IS SO ORDERED.

DATED: September 23,  
2016

C.W. HOFFMAN, JR.

UNITED STATES MAGISTRATE JUDGE

*Attorneys for Defendants Nationstar Mortgage, LLC and HSBC Bank, N.A., as Trustee for the Holders of Deutsche Alt-A Securities Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2006-OA1*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Akerman LLP, and that on the 21<sup>st</sup> day of September, 2016, I caused to be served a true and correct copy of the foregoing **DEFENDANTS' MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT BY 45 DAYS (First Request)**, in the following manner:

**(UNITED STATES MAIL)** By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written:

Jose Benjamin Rodriguez  
4353 Grey Spencer Drive  
Las Vegas, Nevada 89141

*Plaintiff Pro Per*

/s/ Carla Llarena

An employee of AKERMAN LLP

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